DNS

CRITERION
CATALYSTS & TECHNOLOGIES

November 9, 2001

Bay Area Air Quality Management District
Attn: Barry Young
939 Ellis Street
San Francisco, CA 94109

Dear Mr. Young,

SUBJECT: Written Comments on the Proposed Major Facility Review Permit for Criterion Catalyst & Technologies Company, L.P., Application 18172, Facility #A0227

A decision was recently made (October 15, 2001) by the BAAQMD to issue CC&T's Major Facility Review Permit for public comment. A final decision on the permit will take place following consideration of comments by the public, the EPA and other interested groups on this. As was outlined in the letter that accompanied the copy of the permit that we received, all parties have 30 days from the date of publication to make those comments. We appreciate the effort made by the District in completing a thorough evaluation of our application and the opportunities that you gave the plant to enter into dialogue with you during that evaluation.

We have carefully reviewed our Major Facility Review Permit and offer the following comments. These comments are intended to clarify certain source specific information that may be in error. Justification is provided with each clarifying issue. We have also identified a few minor clerical errors that appear on the preliminary permit. In addition, we request your concurrence of our understanding of how reporting of our demonstrated compliance will occur.

Again, we thank you for your time and consideration.

Please contact our Environmental Manager, Mr. John Durant at (925) 458 - 7269 if you have questions on the attached comments.

Very truly yours,

CRITERION CATALYSTS & TECHNOLOGIES L.P.

William L. Howell
Site Manager
West Coast Operations

Attachments: 1. Comments (Items 1 to 9)
2 MSDS for Solvent in Cold Cleaner (S-420)

CRI INTERNATIONAL, INC. -- WEST COAST OPERATIONS -- PITTSBURG PLANT
2840 WILLOW PASS ROAD, PITTSBURG, CALIFORNIA 94565-3237
MAIL TO: P.O. BOX 5159, PITTSBURG, CALIFORNIA 94565-0659
TELEPHONE: 925-458-7200; FAX: 925-458-7238

Comments

1. Clerical Changes

Item 1 Page 10, Table II A, S-600, reported capacity is 36 tons/hr max. This value should be changed to 36-tons/day max. Done

Item 2 Page 25, Table IV-I, S109, Part 2, clerical change is required to amend 6-31– to 6-310. Done

2. Comments on Monitoring Reporting Requirements

Item 3 ***"Reports of all required monitoring"*** (Standard Condition I-F) will consist of a report certifying that the records and required monitoring has been performed in accordance with the frequency required by the Title V Permit.

In other words, the report will provide a list of records that have been recorded per the frequency stated in the Applicable Limits and Compliance Monitoring Requirements Table VII-A through HH. It will not include specific numerical data unless otherwise required by the conditions in our existing BAAQMD Permit to Operate

Comments (cont'd.)

3. Title V Permit Review, Additional Comments

Item 4 Actions Required on S-420. The Title V Permit states that S-420, (Cold Cleaner in the Maintenance Shop) is currently subject to NESHAP 40CFR63.460 – Subpart T. This source does not use solvent containing methylene chloride, perchloroethylene, trichloroethylene, 111 trichloroethane, carbon tetrachloride, chloroform or any combination of these halogenated HAP solvents, in a total concentration greater than 5 % by weight, as a cleaning agent. This source has been in operation since 1981, and we believe it is not subject to the applicable requirements of Subpart T. Done 8-16-04 Delete Take care of it

Criterion recommends that the reference be deleted. The MSDS of the solvent used in the cold cleaner is provided in Attachment 4.

Item 5 Table VII-J, S-110, 111, 112, 113 & 114. Sources S-110 through S-114 are abated through Abatement Equipment A-14 (O4 Unit Nuisance Baghouse). Table VII-J of the Title V permit requires that these sources be monitored continuously to comply with BAAQMD condition #13138, part 2, which limit the emissions to 0.39 lb./hr. The monitoring mechanism (type) requires that a bag failure-warning device be used.

The permit limit of 0.39 lb./hr is quantifiable with information provided in the original application. The basis for this limit was calculated from the grain loading limit of 0.006 grains/dscf and the volumetric flow design (8,300 acfm, calculated to 7,580 dscfm).

The District permit evaluation should reflect that this limit is quantifiable with information already provided (see rational used by the District for other quantifiable sources, pg. 24 of the permit evaluation).

Criterion recommends that the monitoring type, and monitoring frequency be deleted from this Table. The monitoring frequency should be replaced with "N" (meaning no monitoring) since the operation is unlikely to deviate from the applicable emission limit based upon the nature of the operation.

Item 6 Table VII-O, S-220 & S-222. Table VII-O of the Title V Permit requires that Sources 220 and 222, (the 05 Repackaging Station and the 05 Grinder Feed Hopper), be source tested on an annual basis to comply with the following limits: 0.15 grains/dscf, 0.01 grains/dscf and 0.415 lb./yr. (hexavalent chromium).

The District has not required source testing for any other source operation to demonstrate compliance with Regulation 6-310 (0.15 grains/dscf). The monitoring type and frequency are in error, and should be deleted, with monitoring frequency replaced with "N".

Comments (cont'd.)

Item 7 For compliance with the 0.01 grains/dscf limit and the 0.415 lb./yr. limit, the monitoring frequency should be changed to an event basis rather than an annual basis. This would be consistent with the basis for Condition 16736 Part 4, which is the regulatory monitoring citation provided in our BAAQMD Permit to Operate.

Criterion recommends that the monitoring frequency "P/A" (Periodic/Annual) and monitoring type (Source Tests) for complying with BAAQMD Reg. 6-310 be deleted and the monitoring frequency replaced with "N". Criterion also recommends that the monitoring frequency "P/A" for complying with both BAAQMD Condition #16736, Parts 2 & 3, be deleted and replace with "P/E" (Periodic/Event Basis). Done

Item 8 TABLE VII-AA, S-504, 505, 506, 507 & 509. Table VII-AA of the Title V permit requires that S-504, 505, 506, 507 and 509 be monitored for residence time via a source tests. This requirement is new, and should be deleted. Source testing won't accomplish the objective of demonstrating compliance for residence time. The residence time is calculated below using the volume of the afterburner (A-56) chamber and stack divided by the volumetric flow (acfm) as measured during the 7/28/01 source test. The operating temperature of the afterburner is continuously monitored as part of Condition #9315 (part 7).

Volumetric flow, Q = 16,330 acfm
Area of the chamber and stack, A = 6.12 ft^2
Stack/chamber height/length, L = 100 ft (note reaction occurs over entire length)

Residence time = (A * L *60 sec/min)/Q

Residence time = 2.25 seconds

Criterion recommends that the residence time compliance-monitoring requirement be deleted and the permit evaluation be amended to reflect the calculation above.

Item 9 Table VII-GG, S-604. Table VII-GG of the Title V permit requires that S-604, X-3 dryer, be monitored on a daily basis to comply with BAAQMD condition #13097, part 5. This requirement should be changed to be consistent with parts 6 & 7 of BAAQMD condition #13097 that require a non-resettable totalizing fuel meter (continuously operated) be maintained and totaled on a monthly basis. Done

Criterion recommends that the "P/D/M" (Periodic/daily/Monthly) monitoring frequency be deleted and replaced with "C/M" (Continuous/Monthly).

SAFETY-KLEEN PREMIUM SOLVENT
SAFETY-KLEEN PREMIUM GOLD SOLVENT

MATERIAL SAFETY DATA SHEET FOR USA AND CANADA

SECTION 1: PRODUCT AND COMPANY IDENTIFICATION

PRODUCT NAME: SAFETY-KLEEN PREMIUM SOLVENT
SAFETY-KLEEN PREMIUM GOLD SOLVENT

SYNONYMS: Parts Washer Solvent; Petroleum Distillates; Petroleum Naptha; Naptha, Solvent; Stoddard Solvent; Mineral Spirits.

PRODUCT PART NUMBERS: 6605, 6638

PRODUCT USE: Cleaning and degreasing metal parts.
If these products are used in combination with other products, refer to the Material Safety Data Sheets for those products.

	24-HOUR EMERGENCY PHONE NUMBERS	
These numbers are for emergency use only. If you desire non-emergency product information, please call a phone number listed below.	**MEDICAL:** **1-800-752-7869 Extension 2 or 1-312-906-6194**	**TRANSPORTATION (SPILL):** **1-800-468-1760 (USA)** **1-613-996-6666 (CANADA) (call collect)**

SUPPLIER: Safety-Kleen Corp.
1301 Gervais Street, Suite 300
Columbia, SC 29201
USA
1-803-933-4200

TECHNICAL INFORMATION 1-800-669-5740, Extension 7500

MSDS FORM NUMBER: 82658 (Also formerly known as 82529) **ISSUE:** March 24, 2000

ORIGINAL ISSUE: January 26, 1995 (Also formerly January 7, 1993) **SUPERSEDES:** April 4, 1997

PREPARED BY: Product MSDS Coordinator **APPROVED BY:** MSDS Task Force

SECTION 2: COMPOSITION/INFORMATION ON INGREDIENTS

WT%	NAME	SYNONYM	CAS NO.	OSHA PEL TWA	OSHA PEL STEL	ACGIH TLV® TWA	ACGIH TLV® STEL	LD[a]	LC[b]
100	Distillates (petroleum), hydrotreated light[e]	N.Av.	64742-47-8	500[d] ppm	N.Av.	100[d] ppm	N.Av.	>5000[c]	>5500[d] mg/m^3/4 hours

N.Av. = Not Available
[a]Oral-Rat LD (mg/kg)
[b]Inhalation-Rat LC
[c]Based on Stoddard solvent: Skin-Rabbit LD_{50} >3000 mg/kg
[d]Based on Stoddard Solvent.
[e]Based on Stoddard Solvent, NIOSH IDLH (Immediately Dangerous to Life or Health): 20000 mg/m^3 (5000 ppm)

SECTION 3: HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW

APPEARANCE
Liquid, clear, colorless to pale yellow, mild hydrocarbon odor.

WARNING!

PHYSICAL HAZARD
Combustible liquid and vapor.

HEALTH HAZARDS
May be harmful if inhaled.
May irritate eyes and skin.
May be harmful if swallowed.
Contains material which may cause central nervous system damage.

ENVIRONMENTAL HAZARDS
Not toxic to aquatic life.

POTENTIAL HEALTH EFFECTS

INHALATION (BREATHING): High concentrations of vapor or mist may be harmful if inhaled. High concentrations of vapor or mist may irritate the respiratory tract (nose, throat, and lungs). High concentrations of vapor or mist may cause nausea, vomiting, headaches, dizziness, loss of coordination, numbness, and other central nervous system effects. Massive acute overexposure may cause rapid central nervous system depression, sudden collapse, coma, and/or death.

EYES: May cause irritation with watering, stinging, and/or redness.

SKIN: May cause irritation. Not likely to be absorbed through the skin in harmful amounts.

INGESTION (SWALLOWING): May be harmful if swallowed. May cause throat irritation, nausea, vomiting, and central nervous system effects as noted under **INHALATION (BREATHING)**. Breathing product into the lungs during ingestion or vomiting may cause lung injury and possible death.

MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE: Individuals with pre-existing respiratory tract (nose, throat, and lungs), central nervous system, eye, and/or skin disorders may have increased susceptibility to the effects of exposure.

CHRONIC: Prolonged or repeated inhalation may cause toxic effects as noted under **INHALATION (BREATHING)**. Prolonged or repeated inhalation and/or ingestion has been suggested to produce kidney toxicity in dogs but in no other species, including humans. According to one unsubstantiated human case report, prolonged or repeated inhalation, skin contact, and/or ingestion may cause mild, acute chemical hepatitis and acute, yellow atrophy (size reduction) of the liver. Prolonged or repeated eye contact may cause inflammation of the membrane lining the eyelids and covering the eyeball (conjunctivitis). Prolonged or repeated skin contact may cause drying, cracking, redness, itching, and/or swelling (dermatitis); and/or burns.

CANCER INFORMATION: No known carcinogenicity. For more information, see **SECTION 11: CARCINOGENICITY.**

Also see **SECTION 15: CALIFORNIA.**

POTENTIAL ENVIRONMENTAL EFFECTS
Product is not toxic to aquatic life. Also see **SECTION 12: ECOLOGICAL INFORMATION.**

SECTION 4: FIRST AID MEASURES

INHALATION: (BREATHING) Remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Oxygen should only be administered by qualified personnel. Someone should stay with victim. Get medical attention if breathing difficulty persists.

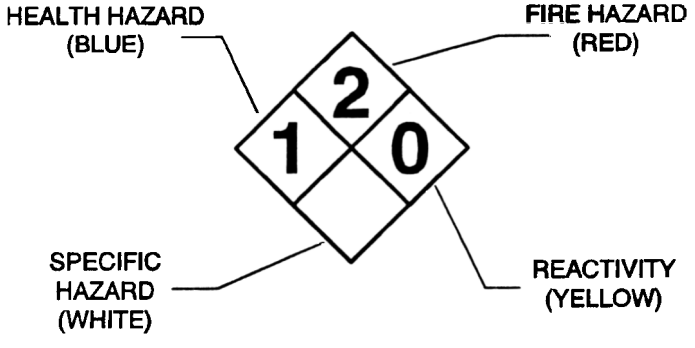
EYES: If irritation or redness from exposure to vapor develops, move away from exposure into fresh air. Upon contact, immediately flush eyes with plenty of lukewarm water, holding eyelids apart, for 15 minutes. Get medical attention.

SKIN: Remove affected clothing and shoes. Wash skin thoroughly with soap and water. Get medical attention if irritation or pain develops or persists.

INGESTION: (SWALLOWING)	Do NOT induce vomiting. Immediately get medical attention. Call 1-800-752-7869, extension 2 or 1-312-906-6194 for additional information. If spontaneous vomiting occurs, keep head below hips to avoid breathing the product into the lungs. Never give anything to an unconscious person by mouth.
NOTE TO PHYSICIANS:	Treat symptomatically and supportively. Administration of gastric lavage, if warranted, should be performed by qualified medical personnel. Treatment may vary with condition of victim and specifics of incident. Call 1-800-752-7869, extension 2 or 1-312-906-6194 for additional information.

SECTION 5: FIRE FIGHTING MEASURES

FLASH POINT:	148°F (64°C) (approximately) Tag Closed Cup
FLAMMABLE LIMITS IN AIR:	**LOWER:** 0.7 VOL% (minimum) **UPPER:** 5 VOL% (maximum)
AUTOIGNITION TEMPERATURE:	410°F (210°C) (minimum)
HAZARDOUS COMBUSTION PRODUCTS:	Decomposition and combustion materials may be toxic. Burning may produce carbon monoxide and unidentified organic compounds.
CONDITIONS OF FLAMMABILITY:	Heat, sparks, or flame.
EXTINGUISHING MEDIA:	Carbon dioxide, regular foam, dry chemical, water spray, or water fog.
NFPA 704 HAZARD IDENTIFICATION:	This information is intended solely for the use by individuals trained in this system.



FIRE FIGHTING INSTRUCTIONS:	Keep storage containers cool with water spray. A positive-pressure, self-contained breathing apparatus (SCBA) and full-body protective equipment are required for fire emergencies.
FIRE AND EXPLOSION HAZARDS:	Vapor explosion hazard indoors, outdoors, or in sewers. Vapors may travel to ignition source and flashback. Vapors will spread along the ground and collect in low or confined areas. Run-off to sewer may create a fire hazard. Heated containers may rupture. "Empty" containers may retain residue and can be dangerous. Not sensitive to mechanical impact. Product may be sensitive to static discharge, which could result in fire or explosion.

SECTION 6: ACCIDENTAL RELEASE MEASURES

Remove all ignition sources. Do not touch or walk through spilled product. Stop leak if you can do it without risk. Wear protective equipment and provide engineering controls as specified in **SECTION 8: EXPOSURE CONTROLS/PERSONAL PROTECTION**. Isolate hazard area. Keep unnecessary and unprotected personnel from entering. Ventilate area and avoid breathing vapor or mist. A vapor suppressing foam may be used to reduce vapors. Contain spill away from surface waters and sewers. Contain spill as a liquid for possible recovery or sorb with compatible sorbent material and shovel with a clean, sparkproof tool into a sealable container for disposal.

Additionally, for large spills: Water spray may reduce vapor, but may not prevent ignition in closed spaces. Dike far ahead of liquid spill for collection and later disposal.

SECTION 7: HANDLING AND STORAGE

HANDLING:	Keep away from heat, sparks, or flame. Where flammable mixtures may be present, equipment safe for such locations should be used. Use clean, sparkproof tools and explosion-proof equipment. When transferring product, metal containers, including trucks and tank cars, should be grounded and bonded. Do not breathe vapor or mist. Use in a well ventilated area. Avoid contact with eyes, skin, clothing, and shoes. Do not smoke while using these products.
SHIPPING AND STORING:	Keep container tightly closed when not in use and during transport. Do not pressurize, cut, weld, braze, solder, drill, or grind containers. Keep containers away from heat, flame, sparks, static electricity, or other sources of ignition. Empty product containers may retain product residue and can be dangerous. See **SECTION 14: TRANSPORT INFORMATION** for Packing Group information.

SECTION 8: EXPOSURE CONTROLS/PERSONAL PROTECTION

ENGINEERING CONTROLS: Provide general ventilation needed to maintain concentration of vapor or mist below applicable exposure limits. Where adequate general ventilation is unavailable, use process enclosures, local exhaust ventilation, or other engineering controls to control airborne levels below recommended exposure limits. Where explosive mixtures may be present, equipment safe for such locations should be used.

PERSONAL PROTECTIVE EQUIPMENT

RESPIRATORY PROTECTION: Use NIOSH-certified, air-purifying respirators with organic vapor cartridges respiratory protective equipment when concentration of vapor or mist exceeds applicable exposure limits. Protection provided by air-purifying respirators is limited. Selection and use of respiratory protective equipment should be in accordance in the USA with OSHA General Industry Standard 29 CFR 1910.134; or in Canada with CSA Standard Z94.4.

EYE PROTECTION: Where eye contact is likely, wear chemical goggles; contact lens use is not recommended.

SKIN PROTECTION: Where skin contact is likely, wear nitrile, supported neoprene, Viton®, polyvinyl alcohol (PVA), laminate (such as North Silver Shield®, Safety 4 4h®, Ansell Edmont Barrier®), or equivalent protective gloves; use of polyvinyl chloride (PVC), natural rubber (latex), or equivalent gloves is not recommended.

To avoid prolonged or repeated contact where spills and splashes are likely, wear appropriate chemical-resistant faceshield, boots, apron, whole body suits, or other protective clothing.

PERSONAL HYGIENE: Use good personal hygiene. Wash thoroughly with soap and water after handling product and before eating, drinking, or using tobacco products. Clean affected clothing, shoes, and protective equipment before reuse. Discard affected clothing, shoes, or protective equipment if they cannot be thoroughly cleaned. Discard leather articles, such as shoes, saturated with the product.

OTHER PROTECTIVE EQUIPMENT: Where spills and splashes are likely, facilities storing or using this product should be equipped with an emergency eyewash and shower, both equipped with clean water, in the immediate work area.

SECTION 9: PHYSICAL AND CHEMICAL PROPERTIES

PHYSICAL STATE, APPEARANCE, AND ODOR:	Liquid, clear, colorless to pale yellow, mild hydrocarbon odor.
ODOR THRESHOLD:	30 ppm (based on Stoddard Solvent)
MOLECULAR WEIGHT:	Not available.
SPECIFIC GRAVITY:	0.78 to 0.82 at 60°F/60°F (15.6°C/15.6°C) (water = 1)
DENSITY:	6.5 to 6.8 LB/US gal (780 to 820 g/l)
VAPOR DENSITY:	5 (air = 1) (approximately)
VAPOR PRESSURE:	0.2 mm Hg at 68°F (20°C) (approximately) 0.6 mm Hg at 100°F (38°C) (approximately)
BOILING POINT:	350°F (177°C) (initial)
FREEZING/MELTING POINT:	-45°F (-43°C) (maximum)
pH:	Not applicable.
EVAPORATION RATE:	0.1 (butyl acetate = 1) (based on Stoddard Solvent)
SOLUBILITY IN WATER:	Insoluble.
FLASH POINT:	148°F (64°C) (approximately) Tag Closed Cup
FLAMMABLE LIMITS IN AIR:	**LOWER:** 0.7 VOL% (minimum) **UPPER:** 5 VOL% (maximum)
AUTOIGNITION TEMPERATURE:	410°F (210°C) (minimum)

SECTION 10: STABILITY AND REACTIVITY

STABILITY:	Stable under normal temperatures and pressures. Avoid heat, sparks, or flame.
INCOMPATIBILITY:	Avoid acids, alkalies, oxidizing agents, reducing agents, or reactive halogens.

REACTIVITY: Polymerization is not known to occur under normal temperatures and pressures. Not reactive with water.

HAZARDOUS DECOMPOSITION PRODUCTS: None under normal temperatures and pressures. See also **SECTION 5: HAZARDOUS COMBUSTION PRODUCTS.**

SECTION 11: TOXICOLOGICAL INFORMATION

SENSITIZATION: Based on best current information, there is no known human sensitization associated with these products.

MUTAGENICITY: Based on best current information, there is no known mutagenicity associated with these products.

CARCINOGENICITY: Based on best current information, there is no known carcinogenicity as regulated by OSHA; as categorized by ACGIH A1 or A2 substances; as categorized by IARC Group 1, Group 2A, or Group 2B agents; or as listed by NTP as either known carcinogens or substances for which there is limited evidence of carcinogenicity in humans or sufficient evidence of carcinogenicity in experimental animals.

Also see **SECTION 15: CALIFORNIA.**

REPRODUCTIVE TOXICITY: Based on best current information, there is no known reproductive toxicity associated with these products.

Also see **SECTION 15: CALIFORNIA.**

TERATOGENICITY: Based on best current information, there is no known teratogenicity associated with these products.

TOXICOLOGICALLY SYNERGISTIC PRODUCT(S): Based on best current information, there are no known toxicologically synergistic products associated with these products.

SECTION 12: ECOLOGICAL INFORMATION

ECOTOXICITY: A Static Acute Bioassay as per the California Department of Fish and Game WPCL, was done using fathead minnows, and up to 750 ppm of the products in water.

The material passed the bioassay with only 1 out of 10 minnows dying. To fail the bioassay, more than 40% of the fish would die in 750 ppm.

OCTANOL/WATER PARTITION COEFFICIENT: Not available.

VOLATILE ORGANIC COMPOUNDS: 100 WT%; 6.5 to 6.8 LB/US gal; 780 to 820 g/l
As per 40 CFR Part 51.100(s).

SECTION 13: DISPOSAL CONSIDERATIONS

DISPOSAL: Dispose in accordance with federal, state, provincial, and local regulations. Regulations may also apply to empty containers. The responsibility for proper waste disposal lies with the owner of the waste. Contact Safety-Kleen regarding recycling or proper disposal.

USEPA WASTE CODE(S): Not regulated.
Based on available data, this information applies to the product as supplied to the user. Processing, use, or contamination by the user may change the waste code(s) applicable to the disposal of these products.

SECTION 14: TRANSPORT INFORMATION

DOT: COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA), NA1993, PG III

TDG: Not regulated.

EMERGENCY RESPONSE GUIDE NUMBER: 128
Reference *North American Emergency Response Guidebook*

SECTION 15: REGULATORY INFORMATION

USA REGULATIONS

SARA SECTIONS 302 AND 304: Based on the ingredient listed in **SECTION 2**, these products do not contain any "extremely hazardous substances" listed pursuant to Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA) Section 302 or Section 304 as identified in 40 CFR Part 355, Appendix A and B.

SARA SECTIONS 311 AND 312: These products pose the following physical and health hazards as defined in 40 CFR Part 370 and are subject to the requirements of sections 311 and 312 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA):

Immediate (Acute) Health Hazard
Delayed (Chronic) Health Hazard
Fire Hazard

SARA SECTION 313:	These products do not contain toxic chemicals subject to the requirements of section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA) and 40 CFR Part 372.
CERCLA:	Based on the ingredient listed in **SECTION 2,** these products do not contain any "hazardous substance" listed pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) in 40 CFR Part 302, Table 302.4.
TSCA:	All the components of these products are listed on the TSCA Inventory.
CALIFORNIA:	These products may contain detectable amounts of benzene CAS 71-43-2 (at or below 0.4 mg/L) and p-dichlorobenzene CAS 106-46-7 (at or below 5 mg/L). WARNING: These chemicals are known to the State of California to cause cancer. These products may contain detectable amounts of benzene CAS 71-43-2 (at or below 0.4 mg/L) and toluene CAS 108-88-3 (at or below 30 mg/L). WARNING: These chemicals are known to the State of California to cause birth defects or other reproductive harm.

CANADIAN REGULATIONS

These products have been classified in accordance with the hazard criteria of the Controlled Products Regulations (CPR) and the MSDS contains all the information required by the CPR.

WHMIS:	B3, D2B
CANADIAN ENVIRONMENTAL PROTECTION ACT (CEPA):	All the components of these products are listed on the Canadian Domestic Substances List (DSL).

SECTION 16: OTHER INFORMATION

REVISION INFORMATION:	Revised format. This MSDS has been revised in the following sections: **SECTION 1:** added SAFETY-KLEEN PREMIUM SOLVENT product **SECTION 3:** Emergency Overview, Inhalation, Chronic **SECTION 4:** Ingestion **SECTION 5:** Upper Flammable Limit, Autoignition Temperature **SECTION 8:** Skin Protection **SECTION 9:** Molecular Weight **SECTION 12:** Ecotoxicity
LABEL/OTHER INFORMATION:	These products are United States Department of Agriculture (USDA) approved and Underwriter's Laboratories (UL) classified.